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17 **UNITED STATES DISTRICT COURT**

18 **NORTHERN DISTRICT OF CALIFORNIA**

19 **SAN FRANCISCO DIVISION**

21 OWEN DIAZ,

22 Plaintiff,

23 v.

24 TESLA, INC. d/b/a TESLA MOTORS, INC.,

25 Defendant.

Case No. 3:17-cv-06748-WHO

**DECLARATION OF
JESSICA QUON-VAILI
IN SUPPORT OF DEFENDANT
TESLA, INC.'S RESPONSE TO
PLAINTIFF'S NOTICE OF NEW
EVIDENCE**

Judge: Hon. William H. Orrick

DECLARATION OF JESSICA QUON-VAILI

I, Jessica Quon-Vaili, hereby declare:

1. I am a paralegal at Defendant Tesla, Inc. (“Tesla”) in this matter. I have personal knowledge of the facts set forth in this declaration, and if called as a witness I could and would testify competently thereto.

2. I make this declaration in support of Tesla’s Response to Plaintiff’s Notice of New Evidence.

3. I oversaw the process to search for documents in Tesla’s custody to produce in response to discovery requests in this matter.

4. None of the recipients on the email chains Mr. Diaz identifies from the *Vaughn* case worked in human resources, were HR partners in Mr. Diaz’s, Mr. Patterson’s, or Demetric Di-az’s departments, or were document custodians in this case.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 15th day of August 2023 in Fremont, California.

/s/ Jessica Quon-Vaili
Jessica Quon-Vaili